

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM BEECHWOOD LITIGATION,

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

-v-

BEECHWOOD RE LTD., et al.,

Defendants.

MARTIN TROTT and CHRISTOPHER SMITH, as
Joint Official Liquidators and Foreign Representatives
of PLATINUM PARTNERS VALUE ARBITRAGE
FUND L.P. (in Official Liquidation) and PLATINUM
PARTNERS VALUE ARBITRAGE FUND L.P.
(in Official Liquidation),

Plaintiffs,

-v-

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.

MELANIE L. CYGANOWSKI, as Equity Receiver for
PLATINUM PARTNERS CREDIT OPPORTUNITIES
MASTER FUND LP, PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (TE) LLC, PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND LLC,
PLATINUM PARTNERS CREDIT OPPORTUNITIES
FUND INTERNATIONAL LTD., PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND
INTERNATIONAL (A) LTD., and PLATINUM

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
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No. 1:18-cv-06658-JSR

No. 1:18-cv-06658-JSR

No. 1:18-cv-10936-JSR

No. 1:18-cv-12018-JSR

PARTNERS CREDIT OPPORTUNITIES FUND (BL) :
LLC, :

Plaintiff, :

v. :

BEECHWOOD RE LTD., et al., :

Defendants. :

-----x

**STIPULATION AND ORDER OF
PROTECTION PURSUANT TO FRE 502(d)**

IT IS HEREBY STIPULATED AND AGREED by and among the parties in the above-captioned actions captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd.*, No. 1:18-cv-06658-JSR, *Trott v. Platinum Management (NY), LLC*, No. 1:18-cv-10936-JSR, and *Cyganowski, as Equity Receiver v. Beechwood Re Ltd.*, No. 1:18-cv-12018-JSR (collectively, the “Actions”), through their undersigned counsel, as follows:

1. This Stipulation and Order (hereinafter, “Order”) is entered pursuant to Rule 502(d) of the Federal Rules of Evidence.

2. The production or disclosure of attorney-client privileged, work product-protected or otherwise protected documents or information (including, without limitation, electronically-stored information (“ESI”)) (“Privileged Material”) in the Actions, whether inadvertent or otherwise, is not a waiver of any applicable attorney-client privilege, work product or other protection. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

3. Nothing contained herein is intended to or shall serve (a) to limit a party’s right to conduct a review of documents or ESI, including metadata, prior to production for relevance, responsiveness, and/or privilege and to withhold documents and ESI from production on the

grounds of the attorney-client privilege, work product doctrine or other immunities, or (b) to require a party to conduct such a review.

4. Nothing contained herein is intended to extend protection to documents and information for which any applicable privilege or protection has been waived by means other than production or disclosure in the Actions.

5. This Stipulation also is not intended to limit any party's right to challenge any review of Privileged Material by another party or its counsel, whether such review occurred prior to or subsequent to the entry of this Stipulation and Order.

6. Any party or counsel receiving Privileged Material that has been produced (whether inadvertently or otherwise) shall, upon request of the producing party or the producing party's counsel, promptly return all copies of such material in his, her or its possession, delete any versions thereof on any database the party receiving the Privileged Material maintains, and make no use of such material; *provided, however,* that the party or counsel returning such material shall have the right to apply to the Court for an order that such material was not protected (prior to the disclosure) by any privilege or doctrine. The failure of a producing party to demand the return of Privileged Material that has been produced shall not constitute a waiver of, or otherwise vitiate, any privilege or protection applicable to such Privileged Material or any of the producing party's rights under this Order.

7. This Order may be executed in any number of counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

8. This Order may be executed by facsimile or by electronic Portable Document Format ("PDF"). A facsimile or electronic signature shall be deemed an original signature for purposes of this Order.

9. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

SO STIPULATED AND AGREED.

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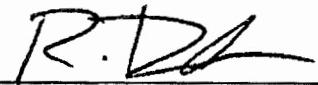
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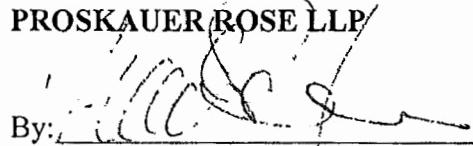
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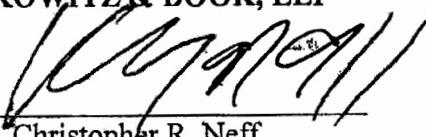
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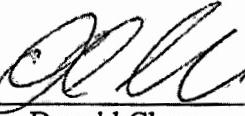
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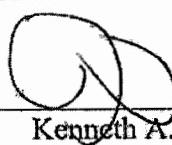
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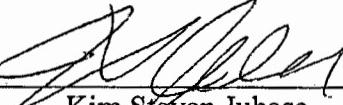
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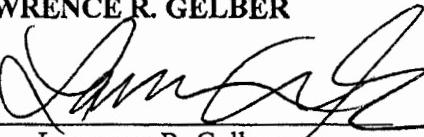
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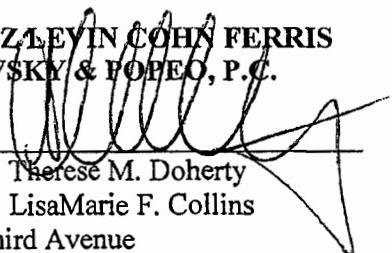
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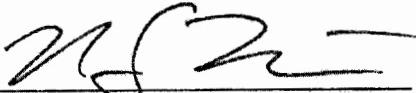
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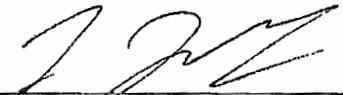
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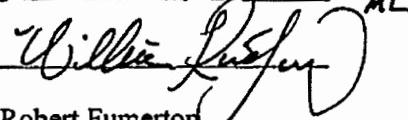
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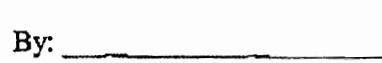
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Subject to Defendants' preservation of, and without waiver of, any rights to object to the propriety of the foregoing trusts as identified and pled in the Complaint

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